

EXHIBIT H

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ROGER PARKER, on his own behalf and on
behalf of all others similarly situated,

Plaintiff,

v.

PERDUE FOODS, LLC,

Defendant.

Case No. 5:22-cv-00268-TES

**PLAINTIFF ROGER PARKER’S RESPONSES AND OBJECTIONS TO
DEFENDANT’S FIRST SET OF INTERROGATORIES**

Plaintiff Roger Parker by and through his undersigned counsel, objects and responds as follows to Defendant’s First Set of Interrogatories (“Interrogatories”).

Without in any way obligating himself to do so, Plaintiff reserves the right to modify, supplement, revise, or amend these Responses, in accordance with the Federal Rules of Civil Procedure, and to correct any errors or omissions which may be contained herein.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Plaintiff objects to the definition of “Identify” to the extent that it exceeds Plaintiff’s obligations to answer Interrogatories under Rule 33 of the Federal Rules of Civil Procedure. Plaintiff will answer with information in his possession, custody, or control.

2. Plaintiff objects to Instruction D to the extent that it exceeds Plaintiff’s obligations to answer Interrogatories under Rule 33 of the Federal Rules of Civil Procedure. Plaintiff will answer to the full extent of Rule 33 and not beyond.

the answer to this interrogatory can be readily derived as soon as possible. Discovery is ongoing and Plaintiff reserves the right to supplement his responses.

INTERROGATORY NO. 19:

Identify any business entity, whether current or past, that you formed or operated for any purpose, including the purpose of fulfilling your contractual obligations as a Producer, including when you formed that entity and how long it was in operation.

RESPONSE: Plaintiff objects to the temporal scope of this interrogatory as overly broad, unduly burdensome, irrelevant, and disproportionate to the needs of the case. Plaintiff further objects to this interrogatory as overbroad, unduly burdensome, and disproportionate to the needs of this case in that, on its face, it seeks information that is not related to Defendant or the claims, allegations, defenses, or issues in the matter.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

- Parker's Poultry
- Parker's Poultry Equipment
- Roosevelt Farm
- Hazel Lee Farms.

This 20th day of July, 2023.

/s/ Jamie Crooks
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